

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In Re: EDWARD GOODWIN)	Bankruptcy Case No.
SSN XXX-XX-3080)	15-81985-CRJ-13
DEBORAH GOODWIN)	
SSN XXX-XX-2747)	
)	
Debtor(s))	

OBJECTION PROOF OF CLAIM

COMES NOW the Debtor(s) in the above styled matter and by and through their attorney objects to the following claim filed by US Bank Trust, designated as claim #9.

1. The Debtor's Chapter 13 plan was filed on **July 24, 2015**.
2. The Debtor listed **US Bank Trust** as a creditor in this case.
3. **US Bank Trust** filed a secured claim in the amount of \$81,912.21.
4. The stay was lifted on the real property.
5. As such, the Debtor respectfully request that the unpaid balance of this claim, as filed, be disallowed in its entirety.

WHEREFORE, Debtor respectfully requests that this Honorable Court disallow the unpaid balance of this claim filed by US Bank Trust in its entirety.

WRITTEN RESPONSE TO THIS MOTION SHALL BE FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT WITHIN THIRTY (30) DAYS OF THE DATE OF SERVICE OF THIS PLEADING UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REPSONSE. THE RESPONSE MUST BE SERVED ON THE PARTY FILING THIS MOTION AND THE CHAPTER 13 STANDING TRUSTEE. THE COURT MAY SET A HEARING DATE ON THE PLEADING. FAILURE TO FILE A RESPONSE BY THE GIVEN DATE MAY RESULT IN THE COURT ENTERING AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

Respectfully submitted,

/s/ B. Grant McNutt

B. Grant McNutt

Attorney for Debtors

Bond, Botes, Sykstus,

Tanner & McNutt, P.C.

102 South Court Street, Suite 314

Florence, AL 35630

(256) 760-1010

CERTIFICATE OF SERVICE

I certify that this motion has been served on the parties or attorneys whose names are set forth below by depositing copies of this motion in the United States Mail, properly addressed and postage prepaid, on this 22nd day of January 2019.

**Michele Hatcher, Trustee
P.O. Box 2388
Decatur, AL 35602**

**US Bank Trust
c/o Angela Viale
Claim Signatory
323 5th Street
Eureka, CA 95501**

**SN Servicing
c/o CORPORATION SERVICE COMPANY INC
Registered Agent
641 SOUTH LAWRENCE STREET
MONTGOMERY, AL 36104**

/s/ B. Grant McNutt
B. Grant McNutt